



April 14, 2003

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

**RE: Petition of SBC Communications Inc. for Forbearance from Section 272
of the Federal Telecommunications Act of 1996
Docket No. 97-172**

Dear Ms. Dortch:

On March 21, 2003, SBC Communications Inc. (SBC) filed the above-referenced petition to allow SBC's Bell Operating Companies¹ (SBC Telcos) to provide international directory assistance. By this letter, the SBC Telcos are requesting that the Commission grant them a waiver of the Commission's comparably efficient interconnection (CEI) requirements as part of their petition for forbearance to allow them to provide international electronic and operator-assisted reverse directory assistance services. SBC respectfully requests that this waiver be considered in connection with the above-referenced petition for forbearance.²

Electronic and operator-assisted reverse directory assistance services are enhanced services that permit a customer to obtain published subscriber name and address information by providing a telephone number. Nonpublished information is not available. Absent a waiver, the SBC Telcos may not provide reverse directory services involving computer processing applications on an integrated basis, unless they comply with the CEI requirements.³

¹ Ameritech Illinois d/b/a SBC Illinois, Ameritech Indiana d/b/a SBC Indiana, Ameritech Michigan d/b/a SBC Michigan, Ameritech Ohio d/b/a SBC Ohio, Ameritech Wisconsin d/b/a SBC Wisconsin, Nevada Bell Telephone Company d/b/a SBC Nevada, Pacific Bell Telephone Company d/b/a SBC California, and Southwestern Bell Telephone L.P. (SBC Telcos).

² SBC notes that the §272(f) requirement that interLATA information services be provided through a structurally separate affiliate expired four years after the date of enactment of the Telecommunications Act of 1996 (on or about February 8, 2000). 47 U.S.C. § 272(f)(2). *See Request for Extension of the Sunset Date of the Structural, Nondiscrimination, and Other Behavioral Safeguards Governing Bell Operating Company Provision of In-Region, InterLATA Information Services*, Order, 15 FCC Rcd 3267 (2000). Consequently, SBC is not requesting forbearance of §272(f).

³ *See Petition of Nevada Bell, Pacific Bell, Southwestern Bell Telephone Company, Southern New England Telephone, and the Ameritech Michigan Bell, Ohio Bell, Illinois Bell, Indiana Bell, and Wisconsin Bell Telephone Companies to Provide Operator-Assisted Reverse Directory Assistance Services and for Waivers and/or Forbearance from Any Comparably*

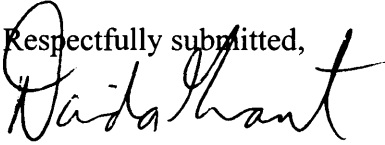
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In the past, the Commission has granted similar waivers to the SBC Telcos, Southern New England Telephone Company, and other non-SBC BOCs for local and national reverse directory assistance services.⁴ As explained in the *SBC/Qwest Reverse DA Order*

In each case, the Bureau found that application of the CEI requirements was not in the public interest because compliance with the requirements was not necessary to allow competing providers to offer the service, and because a waiver was likely to produce benefits for consumers. Each carrier's waiver was conditioned on compliance with the Commission's joint cost rules, on making appropriate adjustments to the carrier's cost accounting manual, and on the carrier's compliance with customer proprietary network information (CPNI) requirements in effect at the time.⁵

In view of these previously granted waivers and the fact that the same public interest issues pertain here, SBC respectfully requests that, as part of the above-referenced petition, the Commission grant the SBC Telcos a waiver of the CEI requirements to provide international electronic and operator-assisted reverse directory assistance services on an integrated basis. SBC understands and acknowledges that this waiver will be conditioned on the SBC Telcos's compliance with the Commission's joint cost rules, on their making appropriate adjustments to their cost accounting manuals, and, although it goes without saying, on their compliance with CPNI regulations.

Please feel free to contact me should you have questions or concerns.

Respectfully submitted,

Davida M. Grant
Senior Counsel

Efficient Interconnection or Telecommunications Act of 1996 Requirement; etc., Memorandum Opinion and Order, 16 FCC Rcd 19255-256 (¶ 1) (Com. Car. Bur. 2001) (*SBC/Qwest Reverse DA Order*).

⁴ See *Ameritech Petition for Waiver of Computer III Rules for Reverse Search Capability*, Order, 13 FCC Rcd 8762, 8767-68, ¶¶ 10-12 (Com. Car. Bur. 1997) (*Ameritech CEI Waiver*); *US West Communications, Inc. Petition for Computer III Waiver*, Memorandum Opinion and Order on Reconsideration, 11 FCC Rcd 7997, 8007-08, ¶¶ 24-25 (Com. Car. Bur. 1996) (*BellSouth and SWBT CEI Waiver*); *US West Communications, Inc. Petition for Computer III Waiver*, Order, 11 FCC Rcd 1195, 1200, ¶¶ 33-34 (Com. Car. Bur. 1995) (*US West CEI Waiver*); and *SBC/Qwest Reverse DA Order*.

⁵ *SBC/Qwest Reverse DA Order*, 16 FCC Rcd at 19258-259 (¶ 6).

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cc: Mr. William A. Kehoe, III -via electronic mail and facsimile
Ms. Christi Shewman- via electronic mail facsimile
Ms. Ann Stevens- via electronic mail and facsimile